

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STATE OF WASHINGTON,

Plaintiff,

v.

LANDMARK TECHNOLOGY A, LLC and  
RAYMOND MERCADO, individually,

Defendants.

NO. 2:21-cv-00728-RSM

STIPULATED MOTION RE:  
BRIEFING SCHEDULE ON CROSS  
MOTIONS

NOTE ON MOTION CALENDAR:  
WEDNESDAY, MAY 8, 2024

**STIPULATION**

Pursuant to LCR 7(k), Plaintiff State of Washington (“State”) and Defendants Landmark Technology A, LLC (“Landmark”) and Raymond Mercado (collectively, “the Parties”) hereby agree to the following briefing schedule for the State’s Motion for Ruling Regarding the Applicable Legal Test for Determining Bad Faith (“State’s Motion”), filed on April 18, 2024, and Landmark’s Response in Opposition to State of Washington’s Motion for Ruling Regarding the Applicable Legal Test for Determining Bad Faith and Cross-Motion for Summary Judgment Establishing Applicable Legal Test for *Noerr-Pennington* Immunity (“Landmark’s Motion”), filed on May 6, 2024:

State's Combined Reply and Response Brief: May 28, 2024

Landmark's Reply Brief: June 3, 2024

The Parties further agree that the Court may hear both the State's Motion and Landmark's Motion on June 3, 2024.

DATED: May 8, 2024

/s/ Bob Hyde

AARON J. FICKES, WSBA #51584

BEN J. BRYSA CZ, WSBA #54683

HEIDI C. ANDERSON, WSBA #37603

ROBERT HYDE, WSBA #33593

MICHAEL HALL, WSBA #19871

Assistant Attorneys General

800 Fifth Avenue, Suite 2000

Seattle, WA 98104

(206) 464-7744

*Attorneys for Plaintiff*

DATED: May 8, 2024

/s/ Justin P. Walsh (with permission)

JUSTIN P. WALSH, WSBA #40696

Gleam Law, PLLC

605 First Avenue, Suite 330

Seattle, WA 98104

(206) 693-2900

*Attorney for Defendants*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED this 8<sup>th</sup> day of May, 2024.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I certify that I caused a copy of the foregoing to be served on the following parties via the following methods:

Justin P. Walsh  
Gleam Law, PLLC  
605 1st Avenue, Suite 330  
Seattle, WA 98104  
justin@gleamlaw.com

☐ Legal Messenger  
☐ First-Class Mail, Postage Prepaid  
☐ Certified Mail, Receipt Requested  
☒ Email  
☒ E-Service

I certify, under penalty of perjury under the laws of the State of Washington, that the foregoing is true and correct.

DATED this 8th day of May, 2024, at Seattle, Washington.

s/ Bob Hyde  
ROBERT HYDE, WSBA #33593  
Assistant Attorney General